

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
1998 Biennial Regulatory Review;)		WT Docket No. 98-143
Amendment of Part 97 of the	)	
Commission's Amateur Radio	)	
Service Rules	)	

To: The Commission

**REPLY COMMENTS
OF
THE EDGEWOOD AMATEUR RADIO SOCIETY, INC.**

I. Introduction and Background

The Edgewood Amateur Radio Society, Inc. ("EARS"), representing about 30 licensed amateur radio operators, respectfully submits its Reply to comments filed in the above-captioned proceeding on December 1, 1998. In those comments, in response to the Commission's *Notice of Proposed Rulemaking* ("Notice") released August 10, 1998 (and the Commission's Errata in this proceeding released August 31, 1998), interested parties commented on the changes proposed by the Commission to the Amateur Radio Service.

EARS has been carefully reviewing a sampling of the over 1900 comments filed in response to the NPRM. Of particular interest during our review were the comments of the American Radio Relay League, Incorporated (ARRL).

EARS has followed the evolution of the Amateur Radio Service for many years. Originally formed in 1953, EARS has been in the forefront of advancing amateur communications technology. As an early proponent of the leading technology such as the FM mode of operation in the Amateur spectrum and now with digital capabilities EARS has always operated an amateur club station utilizing the most current amateur technology available.

What we have found over the years is that the technical capabilities of the members usually are not consistent with the class of amateur license held. As the amateur community suffered through the incentive licensing fiasco of 1976 it turned out that those EARS members who continued to advance the radio communications art did so not based on license class but based on technological capability. EARS has always supported a simplified licensing structure.

In the mid 1970's EARS proposed a no code, VHF only, license which we called the Communicator Class license. It turns out that the proposal, while rejected at the time by the Commission, has resurfaced at least twice. First, in another proposal using the same name which was also rejected by the Commission, and finally as the current no code Technician class license which has been embraced by the overwhelming majority of those entering the ranks of Amateur Radio. Clearly a trend has been evolving to move away from CW as a prime requirement for an Amateur Radio License.

II. SIMPLIFICATION OF THE AMATEUR LICENSING STRUCTURE IS A NECESSARY STEP FORWARD.

Now we have before us the opportunity to support changes in the Amateur Radio Service that make the license structure more meaningful against the operator privileges conferred. Our sampling of comments filed on behalf of this NPRM suggest that the majority of respondents support a simplified license structure with minimal Morse code (CW) requirements.

It is clear that world wide, most governments have simplified the structure of amateur radio. Most simply have a 3 class system with the letter designators A, B, and C. As more countries enter into reciprocal agreements for amateur operation by visitors it is very important that the United States fall in line with this type of licensing structure. It is interesting to note that the agreement the US entered into with the EC countries earlier this year grant the equivalent privileges of a US general class license to US holders of a Technician Plus. This is a clear indication that the importance of the (CW) capability is waning worldwide.

III. OUR POSITION ON COMMENTS ASKING FOR CHANGES TO THE AMATEUR LICENSING STRUCTURE.

EARS supports the ARRL comments as filed. The ARRL volunteer Directors are to be commended for producing a proposal that simplifies the licensing structure while guaranteeing that no currently licensed amateurs lose any privileges. It is clear that the Directors listened to the many comments from both ARRL members and non-members before formulating their proposal and comments.

The ARRL comments regarding the refarming of current Novice spectrum is a very important point which must not be minimized. The increase in HF activity that can be expected from implementing this proposal will make it mandatory that more spectrum be made available to the amateurs holding less than the highest class of license.

The ARRL properly notes that CW is a mode that has no usefulness as a primary qualification to hold an amateur license. Of particular interest is the suggestion that a Technician class (under the proposal) licensee be allowed access to the CW HF bands with no formal testing. This proposal expands on the concept that CW is a skill that improves with use and is one of the best arguments for minimum CW testing requirements that could be made.

If we were to take exception with any part of the ARRL comments it would be to further reduce the CW requirements to a simple test that shows a familiarity with CW as required by international regulation. Enhanced operating privileges should be based on further technical examination.

We feel that over the next two or three years the International community will remove the CW requirement totally from the International rules. Any changes made to our licensing structure should be done in a way that makes it very easy to restructure the testing when this happens.

IV. IN SUMMARY

EARS takes this opportunity to commend the Commission staff for making enforcement of the Amateur Radio Rules and Regulations a high priority. After reviewing many of the comments filed in support of the changes the ARRL has proposed we have a renewed hope that Amateur Radio will start to grow again if the licensing structure can be reworked to reflect the current state of technology and the changing interests of the potential amateur radio operator.

It is our hope that the Commission will act promptly to make these necessary changes.

Respectfully submitted

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December 15, 1998